

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HENRY BARABIN and GERALDINE
BARABIN,

Plaintiffs,

v.

ALBANY INTERNATIONAL CORP., et
al.,

Defendants.

No. C07-1454 RSL

DECLARATION OF CAMERON O.
CARTER IN SUPPORT OF
PLAINTIFFS' RESPONSES TO
DEFENDANT ASTENJOHNSON'S
MOTION IN LIMINE TO EXCLUDE
KENNETH COHEN

I, Cameron O. Carter, declare and state as follows:

1. I make the following declaration based on my own personal knowledge, and if called to testify, could testify competently thereto.
2. I am a lawyer with the firm of Brayton Purcell, representing the plaintiffs Henry and Geraldine Barabin.
3. Attached hereto as Exhibit 1 is a true and correct copy of the curriculum vitae of Kenneth S. Cohen.

I certify (declare) under penalty of perjury under the laws of the States of Washington and Oregon that the foregoing is true and correct to the best of my knowledge.

DATED this 24th day of August, 2009 at Portland, OR.

/s/ Cameron O. Carter

Cameron O. Carter

1 - DECLARATION OF CAMERON O. CARTER IN SUPPORT OF PLAINTIFFS' RESPONSES TO
DEFENDANT ASTENJOHNSON'S MOTION IN LIMINE TO EXCLUDE
KENNETH COHEN

BRAYTON ♦ PURCELL, LLP
Columbia Square Building
111 SW Columbia Street, Suite 250
Portland, Oregon 97201

EXHIBIT 1

KENNETH S. COHEN

PERSONAL

Born...May 30, 1937 Los Angeles, CA.

Health...Excellent, ht. 5'8", weight 180#

Married..1961, wife Karen, BS (Microbiology)
Med-Tech. Former Dir/Manager of Clinical/Environmental
Lab.

Four children.

Residence...Own home in suburb of San Diego;

11724 Shadow Valley Rd
El Cajon, CA 92020
(619) 579-6233
anergy@cox.net

Fifty years in area.

Clearances held... Secret-DOD, Confidential.

EDUCATION

Upper-division(B.S.) and Graduate work at SAN DIEGO
STATE UNIVERSITY. Both programs were in the fields of
Microbiology with a heavy Chemistry emphasis. Last
attended 1967.

Doctoral work completed at CALIFORNIA WESTERN
UNIVERSITY and the PhD. degree awarded 1976.
Dissertational investigation in the area of Occupational
Health, (industrial ventilation engineering):

*"Toxic vapor simulation of industrial
ventilation systems using Sulfur Hexafluoride."*

Pharmacy school, in conjunction with Naval tour of duty
1960.

LICENSE & CERTIFICATIONS - Existing or Previously Held:

Calif. Lic. Forensic Alcohol Supervisor.
No expiration date

Calif.Lic.Jr.CollegeTeachingCredential #77131.
No longer active

Calif. Lic. Medical Laboratory Tech.#11169, Renewal
Annually - No longer active

Calif. Lic. Manuf.Pharmacist #E-5351-M
No expiration date

Calif. Lic. Public Health Microbiologist #1146
No expiration date

Calif. Lic. Radiation Safety Officer #2592-59
No longer active

Calif. Registered Professional Engineer (SF-2929)
Reregistered Annually – Voluntarily retired June 2003

Canadian Registered Occupational Hygienist #421 CRBOH,
February 1992.
No longer active

Certified Industrial Hygienist (CIH-ABIH) #1537
Comprehensive Practice. Recertified 1986-1992, 1992-
1998. Voluntarily retired June 2003

Certified Marine Chemist Training (NFPA) 100/300 hours.
No longer active

Shipyard Competent Person Training (NFPA)
No longer active

Certified Mine Safety & Health (MSHA) Instructor
No longer active

Certified AHERA Asbestos Inspector & Management
Planner [8802-02-014 & 8802-02-078] Recertified 1989,
1990, 1991, 1992 (UC Berkley) - No longer active

Calif.Registered Environmental Assessor (REA-00703)
No longer active

ADDITIONAL GRADUATE EDUCATION

HARVARD 1977-"Evaluation and control of Occupational Hazards."

TEXAS A & M - "Safety in the Chemical Industry"

ACGIH - "Labeling and Warning Systems" 1977, Washington, DC.

Education (Cont.)

SDTLA - "Defective Products" Seminar, July 1978

B & K FORUM 1978 - "Acoustical Engineering Principles workshop."

UNIV.OF MINNESOTA -"Recombinant DNA and Laboratory Safety."
(UCSD) 1978)

AM.COLLEGE OF CHEST PHYSICIANS - "International Conference on
Occupational Lung Disease." San Francisco 1979

MC CRONE INSTITUTE - "Microscopic Identification of Asbestos."
Chicago April 1979 "Advanced Microscopic Identification of
Asbestos." Chicago Nov.1984.

MT.SINAI SCHOOL OF MEDICINE - "Recent Advances in Occupational
Medicine." NY 1979

COOK COUNTY HOSPITAL - "Update in Occupational Medicine."
Chicago 1979

S.O.E.H.-"Epidemiologic Methods for Occupational and Environmental
Studies." Washington, DC December 1979.

UNIV.OF UTAH - "Design and Evaluation of Industrial ventilation
Systems." July 1980.

UNIV.OF CALIF.LOS ANGELES-"On-line Services Training for the
National Library of Medicine." January 1981.

U.S.MINE SAFETY & HEALTH ADMIN.- "Toxicology Data Base
Workshops" February 1981

UNIV.OFCALIF.DAVIS-"Occupational and Environmental Medicine" May
1985.

LOVELACE INHALATION TOXICOLOGY RESEARCH FOUNDATION
"Concepts in Inhalation Toxicology" October 1986.

TUFTS UNIVERSITY - "AHERA Inspection & Management Planning"
February 1988.

U.C.BERKLEY - "Advanced Topics in Building (Asbestos) Inspection and
Management Planning." March 1989, 1990, 1991, 1992.

U.of WASHINGTON - "Advances in Pesticide Medicine" August 24, 1989.

U.S.E.P.A.-"Total Exposure Assessment Monitoring (TEAM) Workshop."
Las Vegas, NV November 1989.

U.S.E.P.A.-"Medical & Infectious Waste Management & Disposal" San
Francisco, CA, January 1990.

CALIF-DHS-"Environmental Epidemiology" Buena Park, CA, February
1990.

U.C.DAVIS-"Environmental Auditing: Legal and Regulatory Framework"
Sacramento, CA March 1990.

AIHC-91-"Industrial Hygiene in the Healthcare Industry: Before & After
OSHA's Blood-borne Pathogen Standard" Salt Lake City, UT May
1991.

PUBLISHED BIOGRAPHIES

American Men & Women of Science, Physical Biological Sciences, 14th
Edition.

Biographical Directory of the American Public Health Association, 1979.

SELECTED AFFILIATIONS (Committee or Service, past and current)

AIR POLLUTION CONTROL ASSOCIATION (APCA)

AMERICAN ACADEMY OF INDUSTRIAL HYGIENE:
Diplomate

AMERICAN CHEMICAL SOCIETY (ACS):
Chemical Health & Safety Committee
Chemistry & the Law Committee

AMERICAN COLLEGE OF TOXICOLOGY (ACT):
Occupational Health Committee (Ad hoc)

AM. CONFERENCE OF GOV. INDUSTRIAL HYGIENISTS (ACGIH)

AMERICAN INDUSTRIAL HYGIENE ASSOCIATION (AIHA):

Computer Applications Comm.(Chair)
Law Committee
Textbook Committee (Ad Hoc)
Toxicology Committee
Education & Training Committee
Continuing Education Committee

AMERICAN PUBLIC HEALTH ASSOCIATION (APHA)

Occupational Health section

AMERICAN SOCIETY OF SAFETY ENGINEERS

National Member Education Committee
National Professional Dev. Committee
President, San Diego Chapter
Safety Engineer of the Year 1982
San Diego Chapter

NATIONAL ENVIRONMENTAL HEALTH ASSOCIATION

NATIONAL FIRE PROTECTION ASSOCIATION (NFPA)

Electrical Standards Committee

NEW YORK ACADEMY OF SCIENCES

SAN DIEGO COUNTY PULMONARY SOCIETY

SAN DIEGO COUNTY LUNG ASSOCIATION:

Environmental Health Task Force

SOCIETY OF ENV. TOXICOLOGY AND CHEMISTRY

SELECTED COURT QUALIFICATIONS AND TESTIMONY

Expert witness testimony, Court qualified in Municipal, Superior and Federal jurisdictions, or Professional Litigation support consultation has been given throughout the United States, in the following areas:

- * ALCOHOL AND INTOXICATION EFFECTS
- * ASBESTOS: Maritime, Commercial, Industrial, and Residential applications. Health effects.
- * DEFENSE AND PLAINTIFF ATTORNEY REVIEW: of case aspects in many areas of potential litigation.
 - * DRUGS; THERAPUTIC AND ABUSE SUBSTANCES.
 - * ERGONOMICS AND WORKPLACE DESIGN.
 - * HOMICIDE, MEDICAL ASPECTS.
 - * HOMICIDE, CHEMICAL EXPOSURE INDUCTION.
 - * MEDICAL, HOSPITAL, AND STAFF MALPRACTICE CASE REVIEW.
 - * MICROBIOLOGICAL CONTAMINATION OF FOOD: Products and Sources.
 - * OCCUPATIONAL TOXICOLOGY
 - * PRODUCT DEFECT, LABELING AND LIABILITY.
 - * PRODUCT FAILURE ENGINEERING
 - * SAFETY ASPECTS OF INDUSTRIAL, COMMERCIAL, AND RESIDENTIAL SITES.
 - * WARNINGS, LABELS, AND HUMAN FACTORS ENGINEERING

SELECTED PUBLICATIONS

Books and Monographs:

"MANAGEMENT PROCEDURES FOR ASSESSMENT OF FRIABLE ASBESTOS INSULATING MATERIALS." Naval Civil Engineering Laboratory, E.Lory-Editor, K.Cohen and R.Sawyer associate authors, March 1980.

"Professional Liability in Occupational Health." Chapter 34, LEGAL AND ETHICAL DILEMMAS IN OCCUPATIONAL HEALTH, Lee, J.S.and W.N.Rom, Ann Arbor Science, 1982

"How to tap Occupational Safety and Health Resources." Chapter 7, HANDBOOK OF OCCUPATIONAL SAFETY AND HEALTH, Slote, P. JOHN WILEY & SONS, New York, 1987.

"Computer Glossary" COMPUTER APPLICATIONS IN SAFETY & HEALTH" K.Cohen, AIHA , Akron OH, 1989. (Inception Editor)

"MICROCOMPUTER APPLICATIONS IN OCC. SAFETY & HEALTH", Lewis-ACGIH co-Publication, Computer Applications Glossary p209-222, 1987.

"Unique Occurrences of Asbestos" THE CURRENT STATUS OF THE ASBESTOS PUBLIC HEALTH PROBLEM, G.A. Peters & B.J. Peters (Eds.), Butterworth-Salem NH, 1994.

"EXPERT WITNESSING AND SCIENTIFIC TESTIMONY: Surviving in the Courtroom" K. S. Cohen & C. Andreas, CRC Press-Taylor & Francis Group, Boca Raton, FL – July 2007.

Articles:

"Toxicology Tunnel Vision" PROFESSIONAL SAFETY December, 1977.

"Unrecognized Industrial Diseases Caused by Chemicals." OCCUPATIONAL MEDICINE & WORKERS COMPENSATION NEWSLETTER, Kaiser Permanente Medical Care Program, San Diego VOL.II, No.1, January 6, 1978.

"Health Hazard Awareness" PROTECTION, Oct.1978

"A BASIC TOOL-KIT FOR THE SAFETY PRACTITIONER: Suggested tools for documenting recognized health hazards." PROFESSIONAL SAFETY, Dec.1978.

"The Video-tape Revolution in Employee Education." OCCUPATIONAL HEALTH & SAFETY, July 1982.

"HEALTH AND SAFETY CONSULTANTS: Uses and abuses."
OCCUPATIONAL HEALTH & SAFETY, Nov. 1982.

"Hazardous Material Information Resources" OCCUPATIONAL HEALTH
& SAFETY, February 1983.

"Hidden Chemical Dangers May Exist Despite Safety Precautions."
OCCUPATIONAL HEALTH & SAFETY, February 1984.

"Custom TOXFILE Can Offer Low-Cost Toxicological Data Base."
OCCUPATIONAL HEALTH & SAFETY, May 1984.

"Asbestos in Buildings: To Remove or Not to Remove, that is the
Question", Guest Editorial, Am.Ind.Hyg.Assoc.J. (46) September
1985.

"Dust Reduction in Asbestos Bulk Sampling" APPLIED INDUSTRIAL
HYGIENE Vol.3:(4) 1988

"Analysis of Bulk and Aerosolized Asbestos Fibers from Childrens Play
Sand Reveal a Potential Health Hazard" Abraham,J.,K.Cohen,
B.Powell, C.Meritt. November 30, 1988 Research Poster Winner,
SUNY Health Science Center Second Annual Research Poster
Session. Syracuse, NY.

"Mexico's Regulations on Hazardous Materials and Wastes" Medina, E.
and K.S.Cohen. AHMP Newsletter Vol.4 No.1, February 1990.

"Lipoid Pneumonia: an old enemy, revisited in San Diego" K.S.Cohen,
ASSE-SD Newsletter February 1991.

"Sarcoidosis and Beryllium Exposure" K.S. Cohen, Western Journal of
Medicine, October 1995, Vol. 163, No. 4, p.396.

EDITORIAL POSITIONS (Past or Current)

Journal of the American Industrial Hygiene Assoc.
ARTICLE REVIEW - TOXICOLOGY

Journal of Applied Industrial Hygiene-ACGIH
COMPUTERS IN SAFETY & HEALTH

Occupational Health & Safety.
EDITORIAL ADVISORY BOARD
"IN REVIEW" Monthly Column

EMPLOYMENT HISTORY (Non-academic)

- 1965-1967 NATIONAL CANCER INSTITUTE, at the San Diego Zoo Hospital. San Diego, CA. Established and Directed Clinical Pathology laboratory for research on Sub-human primates used in Cancer studies.
- 1967-1971 BIOLOGICAL ASSOCIATES/SCOTT LABS, San Diego, CA 92111 Owner/General Manager of Biological Chemical Manufacturing company. Made disposable microbiological growth media and reagent chemicals.
- 1972-1976 MICRONOMICS International, Inc. El Cajon, CA 92022 Director of Industrial Hygiene and Analytical services(On & Off). Field and Lab studies, experimental design and Expert Witness testimony.
- 1973-1974 INTERHEALTH LABORATORIES, INC. San Diego, CA. Clinical laboratory marketing and quality control supervisor.
- 1974-1975 SYSTEMS, SCIENCE, AND SOFTWARE, INC. La Jolla, CA 92037 Manager of Environmental Lab and Instrumentation Development.
- 1975 CAMPBELL INDUSTRIES, INC. San Diego, CA 92107 (Employed & Consultant) Corporate Director of Health and Safety for two major shipyards and several manufacturing locations.
- 1976-1978 NAVAL REGIONAL MEDICAL CENTER SAN DIEGO, San Diego, CA 92137 Acting-head of Industrial Hygiene services for the San Diego Region.
- 1988 OWEN CONSULTANTS, Corporate V.P. and Mgr. of Environmental Sciences, San Diego, CA.
- 1978-88, 89-1994 CONSULTING HEALTH SERVICES, (Div. of TOXOS Corporation in 1980), El Cajon CA 92022 Industrial Hygiene & Safety Consulting
- 1994-1998 Cal/OSHA. -High Hazard Unit, Associate Industrial Hygienist, 2100 E. Katella, Anaheim CA 92806. Regulatory Compliance inspections.
- 1998 – Present Retired from active Industrial Hygiene and Safety Engineering practice. Semi-retirement activity in the area of Litigation support, on a limited basis.

EMPLOYMENT HISTORY (Academic)

UNIV.OF CALIFORNIA SAN DIEGO:

Medical School CEU, Dept.of Community Medicine
Industrial Toxicology I & II
Industrial Hygiene X405.5
Engineering Extension
Industrial hygiene for HAZCOM workers

SAN DIEGO COMMUNITY COLLEGE:

Introduction to Occupational Safety & Health
Standards, Codes, Regulations & OSHA Law
Introduction to FED/OSHA, 8-hr. Apprentice course.
Industrial Hygiene
Clinical Chemistry
Clinical Microbiology

NATIONAL UNIVERSITY:

Industrial Hygiene
Toxicology I & II
Occupational Health

UNIVERSITY OF SOUTHERN CALIFORNIA:

Recognition of Occupational Health Hazards

SAN DIEGO STATE UNIVERSITY:

Nursing Microbiology Lab

SDSU-GRADUATE SCHOOL OF PUBLIC HEALTH

Industrial Hygiene
Air Pollution Control Lab
Environmental Hygiene Lab
Industrial Ventilation

SCHOOL OF ENGINEERING

Control of the Human Environment

LECTURE SEATS & SPEAKING ENGAGEMENTS

SAN DIEGO TRIAL LAWYERS ASSOC. "Courtroom Medicine Laboratory
Diagnosis" 1977

AMERICAN SOCIETY OF SAFETY ENGINEERS - Nationwide tour
presentation of "Health Hazard Awareness for the Safety
Practitioner" 1976-78.

UNIV. OF WISCONSIN, School for Workers, "Asbestos health hazard workshop" FMTU-Stewards Long Beach Naval Shipyard. 1977

INDIANA UNIVERSITY - (Bloomington), Navy Safety School, "Industrial Carcinogens" 1976-77.

E.St.JOHN HOLT & ASSOCIATES, Ltd. Lecture series through out the United Kingdom on "Health Hazard Awareness" London, Southampton, Wales, Harrigut. 1978

ARIZONA STATE UNIVERSITY (Tempe), U.S.A.F. Ground Safety School, "Introduction to Occupational Health" 1978-79.

UNIV.OF CALIFORNIA-DAVIS, Medical School, 1979 "The Pathology Spectrum of Occupational Lung Disease."

UNIV.OF UTAH- (Salt Lake City), "Advanced Respiratory Protection-Legal Aspects" R.M.C.O.E.H. 1980

UNIVERSITY OF SOUTHERN CALIFORNIA, "Recognition of Occupational Health Hazards - NIOSH 510" School of Safety and Systems Management 1980.

COLORADO STATE UNIVERSITY, "EPA - Introduction to Indoor Air Quality Problems." Tucson, AZ & Reno, NV – 1995

MEALEY'S ASBESTOS MEDICINE CONFERENCE, "Industrial Hygiene aspects of Asbestos Premises Liability" Chicago, IL 2006.